

# NECHELES LAW LLP

ATTORNEYS AT LAW

---

535 5<sup>TH</sup> AVENUE, 4<sup>TH</sup> FLOOR  
NEW YORK, N.Y. 10017  
TELEPHONE: (212) 997-7400  
TELECOPIER: (212) 997-7646

March 6, 2021

**Via ECF**

Hon. Ronnie Abrams  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Application granted.

SO ORDERED.



Ronnie Abrams, U.S.D.J.  
March 8, 2021

Re: *United States v. Shmuel Abraham*, 20-cr-411-RA

Dear Judge Abrams:

We write, on behalf of our client Shmuel Abraham, to respectfully request permission for Mr. Abraham to travel to Florida from March 22 until April 7, to celebrate there the upcoming Passover holiday.

Mr. Abraham was arrested last year and charged with Wire Fraud, 18 U.S.C. § 1343, and Monetary Transactions Involving Crime Proceeds, 18 U.S.C. § 1957(a), related to an Amazon business he was running. He was released on a \$2 million personal-recognizance bond, secured by his house and \$50,000 in cash, and co-signed by three FRPs. Dkt. # 34. He also surrendered his and his wife's passports. His travel is restricted to SDNY and EDNY. *Id.*

Last year, before the onset of the pandemic, Mr. Abraham contracted to rent a home in Four Corners, Florida, where he planned on staying for the Passover holiday. After the pandemic began, and he could not use the home last spring, the owner agreed that he could re-book for this year and not lose his deposit. Mr. Abraham therefore requests permission from the Court to travel to Florida, with his wife and child, for the upcoming Passover holiday. Due to the pandemic, Mr. Abraham would also prefer to drive down to Florida than fly there.

Passover this year begins March 26 and ends on April 4. Mr. Abraham would like to start driving down on March 22 (so as to give him adequate time to arrive and then prepare for the holiday) and return to New York by April 7. If this request is granted, we will provide Mr. Abraham's pre-trial officer with the location of the home Mr. Abraham rents and well as any other information he requests.

NECHELES LAW LLP

I have spoken to both Pretrial Services and the U.S. Attorney's Office and neither has any objection to this request.

Sincerely,

/s/  
Gedalia M. Stern

cc: AUSA Jilan Kamal (via ECF)